

EXHIBIT A

[Skip to Main Content](#) [Logout](#) [My Account](#) [Search Menu](#) [New Case Search](#) [Refine Search](#) [Back](#)Location : Galveston County [Images](#)**CASE SUMMARY****CASE No. CV-0070916****Renato Dominguez vs. Black Elk Energy, LLC, et al**§
§
§
§
§
§Case Type: **Injury or Damage - Other**
Date Filed: **10/16/2013**
Location: **County Court at Law No. 2**
Judicial Officer: **Roberts, Barbara**

PARTY INFORMATION

Lead Attorneys**Defendant Black Elk Energy Offshore Operations, LLC****Defendant Black Elk Energy, LLC**
James F Hagemeyer, Registered Agent
11451 Katy Freeway, Ste. 500
Houston, TX 77079**Defendant Black Elk Management, LLC**
John G Hoffman, Registered Agent
11451 Katy Freeway, Ste. 500
Houston, TX 77079**Defendant Black Elk Oil and Gas, LLC**
James F Hagemeyer, Registered Agent
11451 Katy Freeway, Ste. 500
Houston, TX 77079**Defendant Compass Engineering & Consultants of Texas, LLC**
Kirl L Trascher, Registered Agent
14701 St. Marys Lane, Suite 275
Houston, TX 77079**Defendant Compass Engineering & Consultants, LLC**
Hewitt Brooks Bernard, Registered Agent
2505 Southeast Evangeline Thruway
Lafayette, LA 70508**Defendant Enviro-Tech Systems, LLC**
Frank A Richerand, Registered Agent
78219 Oak Ridge Rd
Folsom, LA 70437**Defendant Shamrock Management *Doing Business As* Shamrock Energy Solutions**
Jeffery L Trahan, Registered Agent
4800 Hwy 311
Houma, LA 70360**Defendant Wood Group PSN, Inc.**
Corporation Services Company, Registered Agent
Lawyers Incorporation Services Company
211 E 7th Street, Suite 620
Austin, TX 78701-3218**Defendant Wood Group USA, Inc.**
Corporation Services Company, Registered Agent
211 E. 7th Street, Suite 620
Austin, TX 78707-3218

Plaintiff Dominguez, Renato

Jason A. Itkin
Retained
7132223800(W)
7132223850(F)

EVENTS & ORDERS OF THE COURT

	OTHER EVENTS AND HEARINGS	
10/16/2013	<u>Original Petition (OCA)</u>	
10/16/2013	<u>Case Cover Sheet</u>	
10/17/2013	<u>Status Conference</u>	
10/17/2013	<u>Citation - Service</u>	
	<i>Mailed to atty, they are attaching the Petition</i>	
	Black Elk Energy, LLC	Unserved
	Black Elk Management, LLC	Unserved
	Black Elk Oil and Gas, LLC	Unserved
	Wood Group PSN, Inc.	Unserved
	Wood Group USA, Inc.	Unserved
	Compass Engineering & Consultants, LLC	Unserved
	Compass Engineering & Consultants of Texas, LLC	Unserved
	Shamrock Management	Unserved
	Enviro-Tech Systems, LLC	Unserved
10/17/2013	Clerk's Note	
	<i>called and left message for attorney, Black Elk Energy Offshore Operations, LLC address was left off Original Petition. Told them they will have to file an Amended Petition to change it</i>	
10/18/2013	<u>Demand For Jury Trial</u>	
02/20/2014	Status Conference (2:00 PM) (Judicial Officer Roberts, Barbara)	

Unofficial Record

Filed
13 October 16 P3:09
Dwight D. Sullivan
County Clerk
Galveston County

CAUSE NO. CV70916

Renato Dominguez
Plaintiff,

v.

Black Elk Energy, LLC;
Black Elk Management, LLC;
Black Elk Oil & Gas, LLC;
Black Elk Energy Offshore Operations, LLC;
Wood Group PSN, Inc.;
Wood Group USA, Inc.;
Compass Engineering & Consultants, LLC;
Compass Engineering &
Consultants of Texas, LLC;
Shamrock Management d/b/a
Shamrock Energy Solutions; and
Enviro-Tech Systems, LLC

Defendants.

§ COUNTY COURT AT LAW

§ COURT NO. 2

§ GALVESTON COUNTY, TEXAS

Plaintiff's Original Petition

Plaintiff Renato Dominguez brings this action complaining of Defendants Black Elk Energy, LLC, Black Elk Management, LLC, Black Elk Oil & Gas, LLC, Black Elk Energy Offshore Operations, LLC, Wood Group PSN, Inc., Wood Group USA, Inc., Compass Engineering & Consultants, LLC, Compass Engineering & Consultants of Texas, LLC, Shamrock Management d/b/a Shamrock Energy Solutions, Enviro-Tech Systems, LLC, (all defendants collectively as "Defendants"), and would respectfully show the Court that:

I.

Jurisdiction & Venue

1. This claim is maintained under the Outer Continental Shelf Lands Act (OCSLA) 43 U.S.C. 1331 *et seq.*, and state law. Venue is proper in this county as one or

more of the defendants maintain a principal place of business and a substantial part of the events giving rise to this action occurred within this county.

II.

Discovery Level

2. Discovery in this matter may be conducted under Level 2 of the Texas Rules of Civil Procedure.

III.

Parties

3. Plaintiff is a resident and citizen of Louisiana.

4. Defendant Black Elk Energy, LLC is a Texas limited liability company. Defendant Black Elk Energy, LLC may be served with process through its registered agent: James F. Hagemeyer at 11451 Katy Freeway, Ste. 500, Houston, Texas 77079.

5. Defendant Black Elk Management, LLC is a Texas limited liability company and. Defendant Black Elk Management, LLC may be served with process through its registered agent: John G. Hoffman at 11451 Katy Freeway, Ste. 500, Houston, Texas 77079.

6. Defendant Black Elk Oil & Gas, LLC is a Texas limited liability company and. Defendant Black Elk Oil & Gas, LLC may be served with process through its registered agent: James F. Hagemeyer at 11451 Katy Freeway, Ste. 500, Houston, Texas 77079.

7. Defendant Black Elk Energy, LLC is a Texas limited liability company. Defendant Black Elk Energy, LLC may be served with process through its registered agent: CT Corporation System at 250 N. St. Paul St., Ste. 2900, Dallas Texas 75201-4234.

8. Defendant Wood Group PSN, Inc. is a foreign corporation. Defendant Wood Group PSN, Inc. may be served with process through its registered agent: Corporation

Services Company d/b/a CSC – Lawyers Incorporating Services Company at 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218.

9. Defendant Wood Group USA, Inc. is a Texas Corporation. Defendant Wood Group USA, Inc., may be served with process through its registered agent: Corporation Services Company d/b/a CSC – Lawyers Incorporating Services Company at 211 E. 7th Street, Suite 620, Austin, Texas 78701-3218.

10. Defendant Compass Engineering & Consultants, LLC is a Louisiana limited liability company. Defendant Compass Engineering & Consultants, LLC may be served with process through its registered agent: Hewitt Brooks Bernard at 2505 Southeast Evangeline Thruway, Lafayette, Louisiana 70508.

11. Defendant Compass Engineering & Consultants of Texas, LLC is a Louisiana limited liability company. Defendant Compass Engineering & Consultants of Texas, LLC may be served with process through its registered agent: Kirk L. Trascher at 14701 St. Marys Lane, Suite 275, Houston, Texas 77079.

12. Defendant Shamrock Management LLC d/b/a Shamrock Energy Solutions is a Louisiana limited Liability Company. Defendant Shamrock Management LLC d/b/a Shamrock Energy Solutions may be served with process through its registered agent: Jeffery L. Trahan at 4800 Hwy. 311, Houma, Louisiana 70360.

13. Defendant Enviro-Tech Systems, LLC is a Louisiana limited liability company. Defendant Enviro-Tech Systems, LLC may be served with process through its registered agent: Frank A. Richerand at 78219 Oak Ridge Road, Folsom, Louisiana 70437.

V.

Nature of the Action

14. This lawsuit is necessary as a result of personal injuries that Plaintiff received on or about November 16, 2012. On this date, several explosions occurred on the Black Elk West Delta 32E oil production platform, which is owned, operated, and controlled by Defendants. As a result of the explosions, Plaintiff sustained severe burns and injuries to other parts of his body.

17. Defendants are negligent and negligent per se for the following reasons:

- a. failure to properly supervise their crew;
- b. failure to properly train their employees;
- c. failure to provide adequate safety equipment;
- d. failure to provide adequate medical treatment;
- e. failure to provide a safe work environment;
- f. failure to inspect the platform and/or equipment;
- g. operating with an inadequate crew;
- h. failure to maintain the platform and/or equipment;
- i. vicariously liable for their employees' negligence;
- j. violating applicable Coast Guard, OSHA, and/or BSEE rules; and
- k. other acts deemed negligent.

18. As a result of said occurrences, Plaintiff sustained severe injuries to his body, which resulted in physical pain, mental anguish, disfigurement, and other medical problems. Plaintiff has sustained severe pain, physical impairment, discomfort, disfigurement, mental anguish, and distress. In all reasonable probability, Plaintiff's physical pain, physical

impairment and mental anguish will continue indefinitely. Plaintiff has also suffered a loss of earnings in the past, as well as a loss of future earning capacity. Plaintiff has incurred and will incur pharmaceutical and medical expenses in connection with his injuries.

19. Plaintiff has been damaged in a sum far in excess of the minimum jurisdictional limits of this Honorable Court, for which he now sues.

VI.

Jury Trial

20. Plaintiff hereby requests a trial by jury on all claims.

VII.

Prayer

Plaintiff prays that this citation issue and be served upon Defendants in a form and manner prescribed by law, requiring that the Defendants appear and answer, and that upon final hearing, Plaintiff has judgment against Defendants, both jointly and severally, in a total sum in excess of the minimum jurisdictional limits of this Court, plus pre-judgment and post-judgment interests, all costs of Court, attorneys' fees, punitive damages, and all such other and further relief, to which he may show himself justly entitled.

Respectfully submitted,

ARNOLD & ITKIN LLP

/s/ Jason A. Itkin

Jason A. Itkin

State Bar No. 24032461

Cory D. Itkin

State Bar No. 24050808

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Telephone: (713) 333-5100

Facsimile: (713) 333-5199

ATTORNEYS FOR PLAINTIFF



CIVIL CASE COVER SHEET

Filed
13 October 16 P3:09
Dwight D. Sullivan
County Clerk
Galveston County

COURT: County Court At Law No. 2
of Galveston County

CAUSE NUMBER: CV70916

This Civil Cover Sheet should be completed and filed with the original petition. The information should be the best available at the time of filing, understanding that the information may change before trial.

This information does not constitute a discovery request, response, or supplementation, and is not admissible at trial.

1. Styled <u>Renato Dominguez v. Black Elk Energy, LLC et al</u> <div style="display: flex; justify-content: space-between;"> Plaintiff Defendant </div>			
2. Party filing this cover sheet: Check one: <input checked="" type="checkbox"/> Attorney for Plaintiff(s) <input type="checkbox"/> Plaintiff(s) Name: <u>Jason Itkin</u> Address: <u>6009 Memorial Drive</u> City/ST/ZIP: <u>Houston, Texas 77007</u> Telephone: <u>713-222-3800</u> Fax: <u>713-222-3850</u> Email: <u>jtkin@arnolditkin.com</u> State Bar No.: <u>24032461</u> Signature: <u>/s/ Jason Itkin</u>		3. Plaintiff(s) (list separately) a. <u>Renato Dominguez</u> 4. Defendant(s) (list separately) a. <u>Black Elk Energy, LLC</u> b. <u>Black Elk Management, LLC</u> c. <u>Black Elk Oil and Gas, LLC</u> d. <u>Black Elk Energy Offshore Operations, LLC</u> e. <u>Wood Group PSN, Inc.</u> f. <u>Wood Group USA, Inc.</u> g. <u>Compass Engineering & Consultants, LLC</u> h. <u>Compass Engineering & Consultants of Texas, LLC</u> i. <u>Shamrock Management d/b/a Shamrock Energy Solutions; and</u> j. <u>Enviro-Tech Systems, LLC</u>	
5. Indicate case type (check only one):			
CONTRACT <u>Debt/Contract</u> <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract <u>Employment</u> <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Other Employment: <u>Foreclosure</u> <input type="checkbox"/> Home Equity - Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract:	INJURY OR DAMAGE <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <u>Malpractice</u> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <input type="checkbox"/> Product Liability List product: _____ <input checked="" type="checkbox"/> Other Injury or Damage: <u>Maritime</u>	REAL PROPERTY <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: TAX <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency	OTHER CIVIL <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Expunction <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Name Change <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Worker's Comp <input type="checkbox"/> Other:
PROBATE & MENTAL HEALTH <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Guardianship - Adult <input type="checkbox"/> Guardianship - Minor <input type="checkbox"/> Probate/Wills/Intestate Administration <input type="checkbox"/> Other: </div> <div style="width: 45%;"> <input type="checkbox"/> Mental Health </div> </div>			
6. Indicate sub-topic, if relevant:			
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 25%;"> <input type="checkbox"/> Appeal from municipal/justice court <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari </div> <div style="width: 25%;"> <input type="checkbox"/> Class Action <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader </div> <div style="width: 25%;"> <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-Judgment <input type="checkbox"/> Prejudgment Remedy </div> <div style="width: 25%;"> <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> TRQ/Injunction <input type="checkbox"/> Turnover </div> </div>			
7. Has this case been previously filed, or is it related to a case previously filed, in this county, or in another county or state?			
<div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> No <input type="checkbox"/> Yes, in this county: Court: _____ Cause #: _____ <input type="checkbox"/> Yes, in another county or state: </div> <div> County: _____ State: _____ Cause #: _____ </div> </div>			
8. Level of Discovery:			
<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Level 1 <input checked="" type="checkbox"/> Level 2 <input type="checkbox"/> Level 3 </div>			

COUNTY COURT AT LAW NO. 2 OF GALVESTON COUNTY, TEXAS

COPY

CASE INFORMATION STATEMENT

October 17, 2013

THE CASE INFORMATION STATEMENT IS FOR ADMINISTRATIVE PURPOSES ONLY. IT SHALL BE FILED WITH THE PARTIES ORIGINAL PLEADINGS AND SHALL BE SERVED UPON ALL OTHER PARTIES TO THE ACTION

STYLE:

RENATO DOMINGUEZ

VS.

BLACK ELK ENERGY, LLC ET AL

CAUSE NO. CV-0070916 FILED 10/16/13

STATUS CONFERENCE SET

FOR

02/20/14 @ 2:00 P.M.

Attorney for Petitioner or Pro Se

Attorney for Respondent or Pro Se

State Bar Number

State Bar Number

Address

Address

Phone Number

Phone Number

Fax Number

Fax Number

Indicate the date lasted any special circumstances that may warrant extended discovery or accelerated deposition. If a reply or expedited track requested, explain why. Attach additional sheets if necessary.

Estimated time for Discovery

Estimated time for Trial

Level 1

Level 2

Level 3

Signature of Attorney or Pro Se Party:

Date

ONLY ATTORNEY(S) OR PRO SE PARTY(IES) ARE TO BE PRESENT AT CONFERENCE

You may submit a Docket Control Order in lieu of appearance at the status conference.

FAILURE TO APPEAR AT STATUS CONFERENCE MAY
RESULT IN CASE BEING DISMISSED FOR WANT OF
PROSECUTION

PLEASE FILL OUT AND RETURN

CAUSE NO. CV-0070916

RENATO DOMINGUEZ

VS.

BLACK ELK ENERGY, LLC, ET AL

IN THE COUNTY COURT

AT LAW NUMBER TWO (2)

GALVESTON COUNTY, TEXAS

JURY DEMAND

On this day came the Plaintiff(s), herein by their attorney, and in open court demand a jury and having paid the jury fee; it is Ordered, Adjudged and Decreed by the court that this cause be and the same is placed on the jury docket for trial.

Signed this, the 18 day of April, A.D. 2013.

Barbara Roberts, Presiding Judge
County Court at Law No. 2
Galveston County, Texas

FILED
13 OCT 16 PM 3:14
CLERK OF COURT
GALVESTON COUNTY, TEXAS